UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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'08 MJ 2225

UNITED STATES OF AMERICA,	)	Magistrate Case No.
Plaintiff,	)	
	)	COMPLAINT FOR VIOLATION OF:
v.	)	
	)	Title 8 U.S.C., Sec. 1324 (a)(1)(A)(ii)
Frederick Ramon BOWMAN,	)	Transportation of Illegal
	)	Aliens
Defendant(s)	)	

The undersigned complainant, being duly sworn, states:

On or about **July 21, 2008,** within the Southern District of California, defendant **Frederick Ramon BOWMAN** with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, **Mauricio GONZALEZ-Gonzalez, Noe De Jesus RODRIGUEZ-Vargas,** and **Eliseo RESENDIZ-Hernandez** had come to, entered and remained in the United States in violation of law, did transport and move, said aliens within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

SIGNATURE OF COMPLAINANT
James Trombley
Senior Patrol Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **22nd** DAY OF **JULY, 2008**

Leo S. Papas
UNITED STATES MAGISTRATE JUDGE

CONTINUATION OF COMPLAINT:
Frederick Ramon BOWMAN

PROBABLE CAUSE STATEMENT

Furthermore, the complainant states that **Mauricio GONZALEZ-Gonzalez, Noe De Jesus RODRIGUEZ-Vargas,** and **Eliseo RESENDIZ-Hernandez,** are citizens of a country other than the United States; that said aliens have admitted that they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial by subpoena; and they are material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On July 21, 2008, Border Patrol Agents C. Thielemann and S. Simon were conducting primary inspection duties at the U.S. Border Patrol Highway 94 checkpoint in Jamul, California. The checkpoint was fully operational. At approximately 7:45 a.m., a grey Chevrolet Tahoe with one visible occupant approached the primary inspection area. Agent Thielemann attempted to identify himself as a United States. Border Patrol Agent and conduct an immigration inspection. The vehicle didn't completely stop, and the driver had his window up when he approached the primary agent. Agent Thielemann tapped on the window to try and get the driver's attention but the driver sped up and attempted to flee the checkpoint. As the vehicle sped up, Agent Thielemann and Agent Simon notified Border Patrol Agent F. Fimbres to deploy the spikes, Agent Fimbres was approximately 25 yards ahead at the controlled tire deflation device position (CTDD). As Agent Fimbres deployed the CTDD, the vehicle screeched to a halt in front of the CTDD. The driver later identified as defendant **Frederick Ramon BOWMAN,** immediately placed the vehicle into reverse, driving his vehicle directly towards Agent Simon and Agent Thielemann. Agent Simon drew his service issued weapon, at which time BOWMAN came to a stop.

Agent Simon instructed the driver to place the vehicle in park and exit the vehicle, BOWMAN complied. Agent Simon placed BOWMAN in handcuffs and brought him inside the State Route 94 Checkpoint. The Tahoe was moved into the Secondary Inspection area at the Checkpoint. Agent Simon requested that Senior Patrol Agent A. Markle and his service K9 perform a service canine sniff of the exterior of the vehicle. Agent Markle presented the vehicle to his service K9, and the dog alerted. In the rear area of the vehicle a large speaker box was found. Agent Markle opened the rear door of the vehicle. Initially, Agent Markle was unable to lift or access the underside of the speaker box. Agent Markle lifted up the bottom of the rear seats, and folded it behind the driver's and passenger's seat. Agent Markle was then able to fold down the top of the seat. Agent Markle was able to lift up the bottom of the front panel of the speaker box, which was on hinges, Agent Markle found three people concealed inside of the speaker box. Agent Markle identified himself as a Border Patrol Agent and asked that the people inside of the speaker box to get out of the Tahoe. Agent Markle then performed an immigration inspection. All three admitted to being citizens and nationals of Mexico without any immigration documents to enter or remain within the United States legally. Agent Markle arrested the three individuals, and took them inside the S.R. 94 Checkpoint for processing. BOWMAN was then arrested for alien smuggling.

CONTINUATION OF COMPLAINT:
Frederick Ramon BOWMAN

MATERIAL WITNESSES STATEMENTS:

Material witnesses **Mauricio GONZALEZ-Gonzalez, Noe De Jesus RODRIGUEZ-Vargas,** and **Eliseo RESENDIZ-Hernandez** agree in summary that they are citizens and nationals of Mexico illegally present in the United States. They admit to entering the United States illegally with the assistance of a foot-guide. The foot-guide took them to the load up spot. The material witnesses stated that they were to pay between $3,200.00 to $3,500.00 (USD) to be smuggled into the United States.